

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

|  |   |
|--|---|
| -----X                                   |   |
| CURTIS JAMES JACKSON III                 | : |
| p/k/a 50 CENT, TOMORROW TODAY            | : |
| ENTERTAINMENT, INC., a New York          | : |
| corporation, and G-UNIT RECORDS, INC.,   | : |
| a New York corporation,                  | : |
|  | : |
| Plaintiffs,                              | : |
|  | : |
| vs.                                      | : |
|  | : |
| LEE Q. ODENAT a/k/a "Q" d/b/a            | : |
| <u>WWW.WORLDSTARHIPHOP.COM</u> ,         | : |
| WORLDSTAR HIP HOP, INC., a Nevada        | : |
| corporation, WORLDSTAR, LLC, a Delaware  | : |
| limited liability company, WSHH337, LLC, | : |
| a Delaware limited liability company,    | : |
|  | : |
| Defendants,                              | : |
|  | : |
| vs.                                      | : |
|  | : |
| YVES MONDESIR,                           | : |
|  | : |
| Third-Party Defendant.                   | : |
|  | : |
| -----X                                   |   |

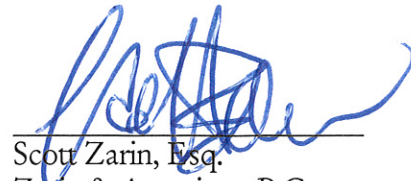
Case No. 09-CV-5583 (JFK/GWG)

**Defendants' Notice of Motion  
To Preclude Copyright  
Statutory Damages Under  
17 U.S.C. §504(c)(2)**

PLEASE TAKE NOTICE that Defendants Lee Q. Odenat ("Odenat"), Worldstar Hip Hop, Inc. (World Star Hip Hop"), Worldstar, LLC ("Worldstar"), and WSHH337, LLC ("WSHH337") (collectively "Defendants"), by and through their attorneys, Zarin & Associates P.C., hereby move to preclude an award of copyright statutory damages under 17 U.S.C. §504(c)(2) for Defendants' infringement of Plaintiffs' copyrights in the photographs containing the images of Tony Yayo and Lloyd Banks, for all the reasons articulated in Defendants' memorandum of law filed herewith in support of said motion.

Dated: September 22, 2014

By:

A handwritten signature in blue ink, appearing to read 'Scott Zarin', is written over a horizontal line.

Scott Zarin, Esq.  
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Worldstar, LLC  
WSHH337, LLC